

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

JURY TRIAL DEMANDED

SAMSUNG'S DEPOSITION DESIGNATIONS

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., (collectively, "Samsung"), hereby provide their affirmative deposition designations, and objections and counter-designations to Plaintiff Headwater Research LLC ("Headwater") deposition designations. Samsung reserves the right to provide supplemental affirmative and counter deposition designations including upon receipt of pretrial disclosures from Headwater and/or as a result of any Order from the Court.

Samsung reserves the right to designate its affirmative designations and counter designations to Headwater's affirmative as counter designations to Headwater's counter designations as appropriate.

Harris, James, November 27, 2023				
DEFENDANTS' INITIAL DEPOSITION DESIGNATIONS	PLAINTIFF'S OBJECTIONS	PLAINTIFF'S COUNTER DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER-COUNTER DESIGNATIONS
8:14-20				
11:1-18				
12:5-22				
13:1-7				
13:8-22				
14:13-22				
15:1-13				
15:14-20				
18:12-22				
19:1-7				
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22:1-8				
23:1-4				
24:18-22				
25:1-9				
28:7-22				
29:1-14				
29:18-22				
30:1-2				
30:4-10				
30:11-14				
33:4-14				
33:19-22				
34:1-4				
34:5-22				
35:1-3				
39:3-12				
39:13-15				
39:21-22				
40:1-5				
41:2-2				
41:3-4				
41:7-8				
41:9-11				
41:12-22				
42:1-7				
43:4-6				
43:7-8				
43:11-17				
43:18-22				
44:1-3				
44:15-17				
44:18-19				
44:21-22				
45:1-2				
45:9-22				

Harris, James, November 27, 2023				
DEFENDANTS' INITIAL DEPOSITION DESIGNATIONS	PLAINTIFF'S OBJECTIONS	PLAINTIFF'S COUNTER DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER-COUNTER DESIGNATIONS
46:1-6				
46:14-16				
46:20-20				
46:21-21				
47:5-12				
48:4-7				
48:8-17				
48:18-22				
49:1-7				
49:11-17				
50:1-5				
50:7-7				
50:8-18				
50:19-22				
51:1-1				
51:2-19				
51:20-22				
52:1-2				
52:3-11				
52:15-18				
56:11-17				
58:14-21				
59:17-19				
59:21-22				
60:1-3				
60:4-17				
60:18-22				
61:1-7				
61:10-13				
62:14-22				
63:1-1				
63:6-13				
63:14-15				
63:19-20				
63:21-22				
64:1-2				
64:3-5				
64:11-16				
64:17-22				
65:1-5				
65:7-10				
65:11-20				
66:2-15				
66:16-22				
67:2-5				
67:7-15				

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DEFENDANTS' INITIAL DEPOSITION DESIGNATIONS	PLAINTIFF'S OBJECTIONS	PLAINTIFF'S COUNTER DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER-COUNTER DESIGNATIONS
67:16-22				
68:1-1				
68:5-9				
68:10-14				
68:16-19				
68:20-22				
69:1-1				
69:2-4				
69:6-9				
69:10-11				
69:13-13				
69:14-22				
70:1-2				
70:7-10				
70:11-13				
70:15-22				
71:1-5				
71:6-8				
71:11-17				
71:18-18				
71:20-22				
72:1-5				
72:6-7				
72:11-18				
72:19-73:1				
74:11-13				
74:19-20				
77:4-7				
77:9-13				
77:14-17				
77:19-20				
77:21-22				
78:1-4				
78:5-6				
78:10-17				
78:18-22				
79:1-1				
79:3-7				
79:13-15				
79:19-20				
80:5-22				
81:1-1				
81:3-17				
82:14-16				
82:21-22				
83:1-22				

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DEFENDANTS' INITIAL DEPOSITION DESIGNATIONS	PLAINTIFF'S OBJECTIONS	PLAINTIFF'S COUNTER DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER- COUNTER DESIGNATIONS
84:1-2				
84:10-14				
85:10-15				
85:16-18				
85:21-22				
86:1-3				
86:4-7				
86:8-18				
86:20-22				
87:1-4				
87:5-13				
87:14-21				
88:1-8				
88:10-17				
88:21-22				
89:1-5				
89:6-9				
89:11-12				
89:14-20				
89:22-22				
90:1-2				
90:3-5				
90:9-12				
90:13-13				
90:15-15				
90:19-22				
91:1-4				
91:8-11				
91:17-22				
92:1-3				
92:6-14				
93:20-22				
94:1-11				
94:12-14				
94:17-22				
95:1-1				
95:15-21				
95:22-22				
96:1-22				
97:1-5				
97:14-22				
98:1-10				
98:11-22				
99:1-22				
100:1-6				
100:9-18				

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100:22-22				
101:1-5				
101:6-22				
102:1-10				
103:22-22				
104:1-1				
104:4-10				
104:13-21				
104:22-22				
105:1-1				
105:9-15				
105:16-17				
105:19-22				
106:3-9				
106:12-17				
106:19-22				
107:1-13				
107:18-22				
108:1-2				
108:4-19				
108:21-22				
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111:1-4				
111:5-12				
112:1-9				
112:17-19				
112:22-113:4				
113:5-11				
113:13-18				
113:20-22				
114:1-8				
114:11-22				
115:1-7				
115:9-14				
115:16-20				
116:1-11				
116:12-14				
116:16-16				
117:9-11				
117:13-15				
118:7-11				
118:14-18				
118:20-22				
119:1-8				
119:10-16				
119:19-22				

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120:1-10				
120:13-14				
121:9-11				
121:14-22				
122:1-2				
122:3-6				
122:9-13				
122:16-22				
123:1-11				
123:14-22				
124:2-8				
125:5-7				
125:10-11				
125:12-15				
125:16-17				
125:19-22				
126:1-4				
126:6-6				
126:7-8				
126:11-19				
131:21-22				
132:1-2				
132:13-14				
132:17-20				
133:1-2				
134:13-22				
135:1-3				
136:7-10				
141:8-15				
141:16-17				
141:20-20				
145:2-8				
145:9-15				
145:21-22				
146:1-4				
146:16-17				
146:19-22				
147:2-3				
147:7-9				
147:10-12				
147:18-21				
148:1-1				
148:2-3				
148:6-7				
149:11-12				
149:14-14				

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150:7-8				
150:10-11				
150:18-22				
153:14-16				
153:20-21				
155:8-10				
155:13-17				
155:21-22				
156:1-8				
156:9-11				
156:14-17				
156:19-22				
157:1-2				
157:5-6				
157:10-21				
158:3-3				
159:20-22				
160:1-11				
160:14-18				
160:19-22				
161:1-1				
161:4-22				
162:1-4				
162:7-13				
164:16-17				
166:18-22				
167:1-14				
167:19-22				
168:1-1				
168:3-21				
169:1-9				
169:11-20				
170:1-11				
170:13-22				
171:1-7				
171:9-22				
172:1-5				
172:7-21				
173:1-15				
173:17-19				
173:22-22				
174:1-9				
174:11-19				
174:21-22				
175:1-1				
175:5-9				

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175:12-22				
176:1-2				
176:6-8				
179:20-180:1				
180:6-6				
180:17-19				
181:1-1				
181:2-3				
181:6-6				
181:10-10				
181:13-22				
182:1-5				
182:7-18				
182:20-22				
183:1-4				
183:6-22				
184:1-4				
184:6-9				
185:7-9				
185:17-22				
189:2-13				

Dated: May 24, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 24, 2024, a true and correct copy of the foregoing was served on counsel of record for Plaintiff via electronic mail.

/s/ Thad C. Kodish

Thad C. Kodish